Doc 17 Filed 12/03/19 Entered 12/03/19 16:58:35 Case 1-19-46882-cec

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK (BROOKLYN)

Return Date: December 10, 2019

Time: 3:00 PM

Case No.: 1-19-46882-cec

In Re:

In Proceeding for

MICHAEL L STATHAKIS

aka Michael Larry Stathakis

fdba Whisk Remodeling Corp.

Chapter 7

Debtor(s)

AMENDED NOTICE OF MOTION TO EXTEND THE AUTOMATIC STAY

PLEASE TAKE NOTICE that upon the annexed motion, the Debtor, through his attorney,

Btzalel Hirschhorn, Esq., will move this Court before the Honorable Carla Craig

Bankruptcy Judge at the United States Bankruptcy Court at 271 Cadman Plaza East, Brooklyn, NY,

Courtroom – 3529, on the 10<sup>th</sup> day of December, 2019 at 3:00 P.M. or soon thereafter as counsel can

be heard, for an Order pursuant to 11 U.S.C. §362 (c)(3)(B) to continue the automatic stay provided

under § 362 (a) and for such other and further relief as may seem just and proper.

Responsive papers shall be filed with the Bankruptcy Court and personally served upon the

attorney for the Debtor, Btzalel Hirschhorn, Esq., no later than five (5) days prior to the hearing date set

forth above. Any responsive papers shall be in conformity with the Federal Rules of Civil Procedure and

indicate the entity submitting the response, the nature of the response and the basis of the response.

Dated: December 3, 2019

Kew Gardens, New York

/s/ Btzalel Hirschhorn, Esq.

BTZALEL HIRSCHHORN, ESQ.

SHIRYAK, BOWMAN, ANDERSON, GILL & KADOCHNIKOV, LLP

Attorneys for Debtor

80-02 Kew Gardens Road, Suite 600

Kew Gardens, NY 11415

Tel: (718) 263-6800 | Fax: (718) 520-9401

Email: Bhirschhorn@abzlaw.com

1

## TO

Via First Class Mail:

## Robert J Musso, Esq.

26 Court Street Suite 2211 Brooklyn, NY 11242 *Trustee* 

## Office of the United States Trustee

Eastern District of NY (Brooklyn Office) U.S. Federal Office Building 201 Varick Street, Suite 1006 New York, NY 10014

## Zann Welch

Claims Processor, Bankruptcy Servicer for BMW Financial Services NA, LLC AIS Portfolio Services, LP 4515 N Santa Fe Avenue, Dept. APS Oklahoma City, OK 73118 Notice of Appearance Filed

THE LAW OFFICE OF MICHAEL C. D'ARIES, LLC Michael C. D'Aries, Esq. 222 Sussex Street Harrison NJ 07029 *Attorneys for 21<sup>st</sup> Century Mortgage Corporation*